

EXHIBIT 18

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,)
Plaintiff,)
)
-vs-) C.A. NO.
)
) 3:23-cv-00243
SOUTHERN BAPTIST CONVENTION;)
GUIDEPOST SOLUTIONS LLC; and)
EXECUTIVE COMMITTEE OF THE)
SOUTHERN BAPTIST CONVENTION,)
Defendants.)

30(b)(6) videotaped deposition of JOHNNY HUNT MINISTRIES, given by JANET HUNT, taken on behalf of the Defendants, pursuant to the stipulations contained herein, reading and signing of the deposition being reserved, in accordance with the Federal Rules of Civil Procedure, before Theresa B. Kramer, Certified Court Reporter, at Bradley Arant Boult Cummings, LLP, Promenade Tower, 1230 Peachtree Street, N.E., Atlanta, Georgia, 30309, on the 19th day of April, 2024, commencing at the hour of 9:08 a.m.

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24 Josh Coleman, Videographer
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1 VIDEOPGRAPHER: We are now on the record.

2 This begins the videotaped deposition of
3 the 30(b)(6) representative for Johnny Hunt
4 Ministries, Incorporated, in the matter of Johnny
5 M. Hunt versus Southern Baptist Convention,
6 Guidepost Solutions, et al., in the United States
7 District Court for the Middle District of
8 Tennessee, Nashville Division.

9 Today's date is April 19th, 2024, and the
10 time is approximately 9:08 a.m.

11 This deposition is being taken at Bradley
12 Arant Boult and Cumming at the -- at the request of
13 Bradley Arant Boult and Cumming.

14 The videographer is Josh Coleman of Magna
15 Legal Services. The court reporter is Theresa
16 Kramer of Magna Legal Services.

17 Will -- and counsel will be noted on the
18 stenographic record. And will the court reporter
19 please swear in the witness.

20 30(b)(6) DEPOSITION OF JOHNNY HUNT MINISTRIES

21 given by JANET HUNT,
22 having been called as a witness, was sworn and
23 testified as follows:

24 MR. MCCORMICK: Should we
25 announce ourselves on the record or is that

1 already --

2 COURT REPORTER: Yes, please.

3 MR. KLEIN: You can. But no one else
4 needs to.

5 CROSS-EXAMINATION

6 BY MR. MCCORMICK:

7 Q. Well, good morning, Mrs. Hunt. Thank you
8 for being here. My name is Terence McCormick. I
9 am counsel for Guidepost Solutions and I'm from the
10 firm of Mintz & Gold in New York and I will be
11 taking your deposition -- depositions this morning.

12 A. Okay.

13 Q. Have you ever been deposed before?

14 A. No, I have not.

15 Q. Okay. Then let me go over a few basic
16 ground rules so that you understand.

17 We're in a -- we're in a conference room,
18 a fairly crowded conference room. But you'll be
19 testifying as you now know under oath. It is the
20 same as though you were in the courtroom in
21 Nashville testifying at trial. The video, your
22 testimony can be played out loud for the Court and
23 the jury. So you have the same legal obligation to
24 testify fully and truthfully in response to my
25 questions.

1 Do you understand?

2 A. Yes, sir.

3 Q. Very good.

4 Occasionally perhaps my colleague and
5 adversary, Mr. MacGill, may ask you on recross or
6 redirect, please tell the Court and the jury. I
7 have never done that before. I might even try it
8 myself. That's why. It's -- it's testimony in
9 court for all purposes. You understand?

10 A. Yes, sir.

11 Q. Okay. Also, as you know, there are going
12 to be two depositions where you're going to be
13 testifying in today.

14 A. Yes.

15 Q. This one that we are starting now is the
16 deposition of Johnny Hunt Ministries.

17 A. Right.

18 Q. You understand that you have been
19 designated as the corporate representative of
20 Johnny Hunt Ministries; correct?

21 A. Yes. Yes.

22 Q. Therefore, anything that you say will
23 bind Johnny Hunt Ministries and you are speaking as
24 the corporation in this room. You understand?

25 A. Yes. Yes.

1 Q. Okay. I will ask questions. Listen. I
2 should look in the mirror saying that because
3 sometimes I have trouble listening. Okay?

4 Let's have an understanding that if you
5 don't understand any of my questions, that will not
6 be the first time that problem has ever occurred.
7 Ask me to clarify. I will do my utmost. Okay?
8 There may be objections just as though we're in a
9 courtroom at a trial. Okay?

10 A. Uh-huh.

11 Q. Your counsel, Mr. MacGill, may object.
12 You may even hear him enumerate a number of reasons
13 why he objects. Hopefully not too many. Hopefully
14 I won't have to get into a long colloquy with him.
15 But if you hear us do that, unless he directs you
16 not to answer on grounds of privilege or otherwise,
17 at the end of the objection, you have to answer my
18 question. You understand?

19 A. Yes, sir.

20 Q. Okay. Ma'am, have you taken any
21 medication within the last 24 hours?

22 A. I did. I took -- I took some Advil this
23 morning.

24 Q. I don't doubt it. Did you take any
25 medication that would interfere with your ability

1 to testify truthfully?

2 A. No, sir.

3 Q. Nothing that would impair your ability to
4 give me a lucid answer?

5 A. No, sir.

6 Q. Okay. That's fine.

7 No alcohol?

8 A. Oh, no.

9 Q. Okay. You're a better man than I am
10 Gunga Din.

11 MR. MCCORMICK: Okay. Let's start. I am
12 going to mark for identification Johnny Hunt
13 Ministries 1. And I'm going to call this JHM.

14 (Defendants' Exhibit No. 1 was marked.)

15 MR. MCCORMICK: I'll give this to the
16 witness.

17 VIDEOGRAPHER: Could you twist the
18 camera so it --

19 MR. MACGILL: Sure, I can.

20 BY MR. MCCORMICK:

21 Q. Mrs. Hunt, do you understand that you are
22 here today pursuant to the service of a subpoena on
23 you?

24 A. Yes, sir.

25 Q. And when I say upon you, and for the

1 present purposes, I mean upon Johnny Hunt
2 Ministries.

3 A. Yes.

4 Q. And do you recognize the document that I
5 have placed in front of you?

6 A. Yes, I do.

7 Q. That is the subpoena to Johnny Hunt
8 Ministries.

9 A. Yes.

10 Q. Okay. And you will see I trust on page 7
11 there's a series of topics that I will be covering
12 this morning. You understand that we expect that
13 you're going to be prepared to answer questions
14 about these topics?

15 A. Yes.

16 Q. You do. And please try to speak up
17 whenever you can.

18 Oh, and one other thing. In response to
19 my questions, you know, obviously you need to say
20 yes or no or hopefully something a little more
21 effusive, but nodding, uh-huh, shaking your head
22 one way or the other doesn't work because the court
23 reporter has to be able to catch that.

24 A. Okay.

25 Q. I should have said that earlier. Okay.

1 Mrs. Hunt, did you do anything to educate
2 yourself to testify in this deposition on the
3 topics in that subpoena?

4 A. Yes, I did.

5 Q. You did. What did you do?

6 A. I met with my attorney last night.

7 Q. Okay. And without going into the
8 conversations between yourself and Mr. MacGill
9 which I will not ask you to -- to do because I may
10 not, did you consult any documents?

11 A. Yes.

12 Q. Can you tell me what those documents
13 were?

14 A. I looked over the subpoena.

15 Q. Uh-huh.

16 A. I looked over the articles of
17 incorporation for Johnny Hunt Ministries. And I
18 looked over the bylaws for Johnny Hunt Ministries.

19 Q. Very good.

20 Did you look over any emails?

21 A. No.

22 Q. Huh. Letters, documents of any other
23 kind?

24 A. No, sir.

25 Q. Tax returns?

1 A. No, sir.

2 Q. If I were to question you about what
3 those tax returns say, would you nevertheless be
4 able to, based on general corporate knowledge, tell
5 the Court what they mean?

6 A. I'll try.

7 Q. Thank you.

8 Did you speak to any other person
9 associated with Johnny Hunt Ministries, a director,
10 officer?

11 A. Like when?

12 Q. Say again, please.

13 A. When and what time frame?

14 Q. Well, in preparation for this deposition.

15 A. No.

16 Q. No?

17 A. I did not.

18 Q. Okay. But you are nevertheless prepared
19 you believe to give testimony on the topics in --
20 in the subpoena?

21 A. Yes, sir.

22 Q. Okay. Johnny Hunt Ministries is a public
23 charity; isn't that correct?

24 A. It is.

25 Q. And it files its returns on Form 990?

1 A. Yes.

2 Q. When was it formed?

3 A. I'm sorry?

4 Q. When was it formed?

5 A. That I don't remember the year. It's
6 been quite a while ago. I don't remember the year.

7 Q. If I were to say to you 2010, would that
8 sound just about right?

9 A. I don't remember the year.

10 Q. Well, let me try and help you out here.
11 Just a moment. Just bear with me.

12 (Defendants' Exhibit No. 2 was marked.)

13 MR. KLEIN: JHM 2.

14 BY MR. MCCORMICK:

15 Q. I think, Mrs. Hunt, you mentioned earlier
16 that in preparation for the deposition you had
17 reviewed the certificate of incorporation and the
18 bylaws --

19 A. Uh-huh.

20 Q. -- of the entity. I've just shown you
21 what has been marked for identification as JHM 2.
22 Could I direct your attention to the last page.

23 Who's James Law?

24 A. He was a board member.

25 Q. Uh-huh. And was he involved in the

1 organization of Johnny Hunt Ministries?

2 A. Yes, he was.

3 Q. And what's the date appearing on the
4 bottom of the bylaws there?

5 A. November 20th of 2010.

6 Q. Does that refresh your recollection?

7 A. Yes, it does.

8 Q. It would have been 2010?

9 A. Yes. Exactly.

10 Q. Thank you.

11 At that time, was Johnny Hunt Ministries
12 a public charity?

13 A. Yes, it was.

14 Q. It was? When was it recognized by the
15 IRS as a 501(c)(3)?

16 A. I don't have that date.

17 Q. Would 2016 sound about right?

18 A. It should have been before.

19 Q. Uh-huh. Okay. What's the announced
20 purpose of Johnny Hunt Ministries in its
21 organizational documents?

22 A. Would you repeat that, please?

23 Q. What's the announced purpose of Johnny
24 Hunt Ministries in -- in its certificate of
25 incorporation?

1 A. Well, we do a lot of mission work around
2 the world and in the States. We give to a lot of
3 other 501(c)(3) organizations that we feel are
4 deemed to -- for our support. That's pretty much
5 it. A lot of mission work.

6 Q. The propagation of the gospel of Jesus
7 Christ?

8 A. Exactly.

9 Q. Okay. Getting the message out?

10 A. Exactly.

11 Q. Supporting church work?

12 A. Exactly.

13 Q. Not to enrich a -- a particular
14 individual?

15 A. No.

16 Q. Okay. Who are its board of directors
17 right now?

18 A. Okay. Johnny Hunt is the CEO. Virginia
19 Anspaugh is the CFO. Sarah Hill is the secretary.
20 And then John Kisse is a member at large.

21 Q. Okay. You've done a terrific job of
22 telling me who three of the officers are and one
23 member at large. Are all of those four individuals
24 directors?

25 A. No.

1 Q. Okay. Let me help you.

2 A. I'm not sure what a director is.

3 Q. It's okay. Well, before I show you an
4 exhibit, are there meetings of the four individuals
5 together at any point?

6 A. Yes.

7 Q. You have an annual meeting?

8 A. Yes.

9 Q. Do you meet quarterly?

10 A. Well, we -- depends on --

11 Q. The needs of the corporation --

12 A. -- the needs of -- right. Yes. We had
13 our last meeting in December.

14 Q. Uh-huh.

15 A. Of '23.

16 Q. Uh-huh.

17 A. And we will be having one in the next
18 couple of months.

19 Q. And you have -- you have regular
20 meetings?

21 A. Yes.

22 Q. And if there's important corporate action
23 to be taken, that's taken by a vote of the people
24 who I'm going to call the directors?

25 A. Yes.

1 Q. The four people you just --

2 A. The four people that you mentioned. Yes.

3 Q. Okay.

4 COURT REPORTER: Remember to speak one at
5 a time.

6 MR. MCCORMICK: I am guilty of violating
7 my own rule. Was just trying to help the witness.
8 Give me a moment, please.

9 I am about to mark for identification JHM
10 3.

11 (Defendants' Exhibit No. 3 was marked.)

12 MR. MCCORMICK: (Tenders.)

13 MR. MACGILL: Thank you.

14 BY MR. MCCORMICK:

15 Q. Do you recognize the document that I've
16 just placed before you as JHM 3?

17 A. Yes, I do.

18 Q. Please identify it for the record.

19 A. It is a Form 990 IRS for Johnny Hunt
20 Ministries.

21 Q. Okay. If I could direct your attention
22 to the page that's Bates numbered on the bottom
23 right JHM- -- I think that's four zeroes, 257.

24 A. Okay.

25 Q. And you'll see there is a Schedule Part

1 7, Section A.

2 A. Yes.

3 Q. And it lists four names?

4 A. Yes.

5 Q. Identifies them as board members?

6 A. Yes.

7 Q. Those are the directors?

8 A. Yes.

9 Q. Yeah.

10 And there's a column next to it. Average
11 hours per week. And then next to that, column that
12 says see position. First one says individual
13 trustee or director XXXX. These are directors?

14 A. Yes.

15 Q. Thank you.

16 Who picks them?

17 A. My husband and I.

18 Q. You and your husband?

19 A. Yes.

20 Q. Who owns Johnny Hunt Ministries, Inc.?

21 A. Well, technically I would say that the
22 board of directors would, that the --

23 Q. Are there shares of the corporation?

24 A. No.

25 Q. No?

1 A. No.

2 Q. It's owned. So it's a corporation that
3 owns itself?

4 A. I don't understand that terminology.

5 Q. Okay. I'll -- I'll withdraw the
6 question.

7 But -- but you and -- and Mr. Hunt
8 select --

9 A. Yes, we do.

10 Q. -- pick people who are going to be on the
11 board of directors?

12 A. Yes, we do.

13 Q. And there's a particular term of years
14 for which during which a person will be a director?

15 A. A person will what?

16 Q. There's a particular term of years under
17 the bylaws when a person will be a trustee or
18 director?

19 A. We haven't ever discussed the length of
20 time that a person would serve if that's what
21 you're asking.

22 Q. Uh-huh. How long have Sarah Hill, John
23 Kisse, Virginia Anspaugh and Johnny Hunt been
24 directors?

25 A. Well, of course, Johnny Hunt's been a

1 director from the beginning of the organization.

2 And then the other three are fairly new because we
3 did have a person to resign off of the board so we
4 needed to replace him. So we pretty much did a
5 restructure.

6 Q. Who resigned?

7 A. Jim Law.

8 Q. Why did Mr. Law resign?

9 A. Because of the Guidepost report.

10 Q. I see. How did you and Mr. Hunt come to
11 select Sarah Hill, John Kisse and Virginia
12 Anspaugh?

13 A. Well, we chose people that we felt like
14 had an interest in the ministries that we were
15 doing.

16 Q. Uh-huh.

17 A. And these are people that we are -- have
18 known for -- throughout the years and have also
19 been supporters of our ministries.

20 Q. They're friends of yours?

21 A. Yes. They were friends.

22 Q. And how do you -- how did you know them
23 originally?

24 A. Well, they were all members of our church
25 that we've known --

1 Q. First -- First Baptist Church --

2 A. -- over the 30 --

3 Q. -- Woodstock --

4 A. -- years. Yes.

5 Q. And I just spoke over you again. I'm
6 sorry. Okay. Thank you.

7 In prior years can you off memory, to the
8 extent you can, could you tell me who the -- who
9 the directors were?

10 A. Jim Law, Greg Moss, and I can't
11 remember --

12 Q. Were you?

13 A. -- who else. I may have been.

14 Q. What about John Carswell?

15 A. Yes. That would have been early in the
16 formation.

17 Q. Or Eddie Carswell?

18 A. Possibly. I just don't remember.

19 Q. Pete Hixson?

20 A. Yes.

21 Q. Yes. Okay.

22 Has Johnny Hunt Ministries ever had
23 employees?

24 A. No. We've never had employees.

25 Q. Never had an employee?

1 A. No.

2 Q. Okay. So the next question of how much
3 time per week the employees work would be a moot
4 question at this point.

5 A. Yes.

6 Q. Yes. Would I be correct in understanding
7 that Mr. Hunt's speaking engagements are
8 principally run through Johnny Hunt Ministries?

9 A. Mostly, yes.

10 Q. Mostly. Historically?

11 A. Yes.

12 Q. Presently?

13 A. It varies.

14 Q. It varies. And you have anticipated my
15 next question.

16 Mrs. Hunt, I am now showing you what is
17 being marked for identification as Johnny Hunt
18 Ministries 4.

19 (Defendants' Exhibit No. 4 was marked.)

20 BY MR. MCCORMICK:

21 Q. Do you recognize the document? I'm
22 asking the witness, do you recognize the document,
23 Mrs. Hunt?

24 A. Yes. They are -- let's see what all this
25 is. Oh, okay. Yes.

1 Q. Can you show me -- some of the income
2 from Mr. Hunt's speaking engagements at one church
3 or another have been reported in past years. Can
4 you show me, have they been reported on the 2019
5 return?

6 A. For his speaking engagements --

7 Q. Yes.

8 A. -- from different churches?

9 Q. Yes.

10 A. Okay. Let me see. Here's one for the
11 Cross Church.

12 Q. Right. And how much money is that?

13 [REDACTED]

14 Q. All right. And which -- which Bates
15 number, bottom of the page are you looking at right
16 now?

17 A. 2579.

18 Q. 2579. Thank you.

19 A. Okay. Let's see. Cross Church. Answers
20 in Genesis.

21 Q. Yes.

22 A. 2580.

23 Q. All right.

24 A. For -- see what the amount --

[REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

6 Q. So a few?

7 A. Yeah.

8 Q. A handful.

9 A. Yes.

10 Q. And from time to time, from one year to
 11 the other on the personal returns, there might be a
 12 couple of these one off speaking engagements at a
 13 church?

14 A. Yes, sir.

15 Q. But the vast majority of the rest were
 16 all part of the -- the program revenue run through
 17 Johnny Hunt Ministries, Inc.?

18 A. Exactly.

19 Q. Just curious, how come there would be
 20 like a half dozen of Mr. Hunt's speaking
 21 engagements paid to him personally on the personal
 22 return as opposed to Johnny Hunt Ministries?

23 A. Well, sometimes they did not get the
 24 message that we wanted -- they didn't get the W
 25 whatever it is, W9, W --

1 Q. Right.

2 A. -- whatever it is to make the checks out
3 to Johnny Hunt Ministries.

4 Q. Okay.

5 A. And they would make it to him personally.
6 So then he would get a 1099.

7 Q. So there was no grand master plan. It's
8 just the way things happened?

9 A. Well, generally we did have the speaking
10 engagement checks made out to Johnny Hunt
11 Ministries. That was our intent.

12 Q. Yes. Yes.

13 A. For his outside speaking engagements when
14 he was employed.

15 Q. Right. I see.

16 VIDEOGRAPHER: Counsel, can you move your
17 microphone to the right side?

18 MR. MCCORMICK: To the right side?

19 VIDEOGRAPHER: Correct. Thank you.

20 Outside the lapel. Or on your tie. That's fine.

21 MR. KLEIN: They didn't teach you this in
22 law school?

23 MR. MCCORMICK: No. There his -- this is
24 his diplomatic way of saying that I don't speak out
25 of both sides of my mouth.

1 (Discussion held off the record.)

2 (Defendants' Exhibit No. 5 was marked.)

3 BY MR. MCCORMICK:

4 Q. Mrs. Hunt, I am now going to place before
5 you what have been marked for identification as JHM
6 5, the 2016 Johnny Hunt Ministries Form 990; JHM 6,
7 the 2017 990; JHM 7, the 2018 990; JHM 8, the 2019
8 990; JHM 9, the 2020 990; and JHM 10, the 2021 990.
9 And I earlier showed you the 2022 990. So keep
10 that handy as well.

11 A. Okay.

12 MR. MACGILL: And, Janet, why don't you
13 hand those to me and I'll get those out of your way
14 so that you don't have too many papers in front of
15 you.

16 THE WITNESS: Okay.

17 MR. MACGILL: Thank you, ma'am. I'll
18 take it. You got -- okay. You got everything you
19 need.

20 May I see those real quick? And the
21 other one as well. Thank you.

22 MR. MCCORMICK: (Tenders.)

23 MR. MACGILL: Thank you.

24 BY MR. MCCORMICK:

25 Q. And this is just to button up the earlier

1 question I had to you about employees and salaries.

2 If you look at page 1 of the 2016 return.

3 A. Okay.

4 Q. On that page, you don't -- you see zero
5 under expenses for salaries on line 15.

6 A. Okay. Tell me what page again.

7 Q. I am sorry. The front page of the --
8 page 2016.

9 A. Oh, all right. Okay. Would you repeat
10 the question, please?

11 Q. Yes. It's -- I am sorry. In my binder I
12 had it as the first page, but here you have to flip
13 to the back to see it.

14 A. Yes.

15 Q. So page -- line item 15.

16 A. Yes.

17 Q. All right. Where it says salaries, other
18 compensation, et cetera?

19 A. Yes.

20 Q. Zero.

21 A. Yes.

22 Q. All right. And the same would be true if
23 you look at each one of the tax returns for the
24 following years?

25 A. It should.

1 Q. Yes.

2 Johnny Hunt Ministries ever pay, since
3 2016, any kind of income to Mr. Hunt?

4 A. No, sir. No. No income.

5 Q. Right. So --

6 A. No.

7 Q. So the tax return says salary zero, no
8 other income of any other kind, 1099 or anything
9 like that?

10 A. Should not have as far as -- as -- I
11 mean, I can't remember that far back, but I don't
12 believe that he would ever have had a 1099 form.

13 Q. Right.

14 A. I could look through here and tell you,
15 but I don't recall him ever having a 1099 form.

16 Q. I'm not going to force you to do that. I
17 think we had some testimony yesterday and perhaps
18 just from the point of view of Johnny Hunt
19 Ministries you could confirm. The whole idea
20 behind Johnny Hunt Ministries was as Mr. Hunt
21 mentioned yesterday, he had made enough money and
22 now he wanted to give back and he set up the JHM
23 ministries to accomplish that.

24 A. You're exactly right.

25 Q. That's correct. Okay.

1 What about 2023?

2 A. What about 2023?

3 Q. Well, we do not have the tax return from
4 2023.

5 A. Oh, right. It hasn't been done yet.

6 Q. It hasn't been completed?

7 A. No. It hasn't.

8 Q. Hasn't been filed?

9 A. No. It hasn't. The due date's not until
10 May 15th.

11 Q. Right. There are drafts though of it?

12 A. Not yet. I'm still in the process of
13 giving them the information.

14 Q. Uh-huh. Do you know on behalf of Johnny
15 Hunt Ministries the bottom line number for revenues
16 and expenses?

17 A. No, I don't.

18 Q. You don't.

19 A. I don't.

20 Q. Can you tell me whether the entity has
21 made a net profit?

22 A. I don't have any idea. I haven't gotten
23 that far yet.

24 Q. Well, maybe we'll come back to that
25 later.

1 We have asked for that to be produced.

2 We would like to have that when it is -- when it is
3 prepared.

4 A. Yeah. That's not a problem.

5 Q. I would ask Mr. -- Mr. MacGill if that --
6 if that can be done.

7 MR. MACGILL: Yeah. Go ahead. Ask your
8 questions. We'll -- we'll deal with you on all --
9 all open items at the appropriate time.

10 MR. MCCORMICK: Okay. You'll take that
11 under advisement?

12 MR. MACGILL: Yeah. I don't see a
13 problem. We'll just cover -- ask your questions of
14 this witness and let's keep moving.

15 MR. MCCORMICK: Sure.

16 (Defendants' Exhibit No. 11 was marked.)

17 BY MR. MCCORMICK:

18 Q. Mrs. Hunt, I want to tell you -- I've
19 just placed before you what was marked for
20 identification as JHM 12.

21 A. This says 11.

22 SPEAKER: Yeah, it's 11.

23 BY MR. MCCORMICK:

24 Q. I'm sorry. 11. Thank you.

25 I am going to acknowledge that there's no

1 particular reason that you should have seen this
2 document before. It is not obviously a document of
3 Johnny Hunt Ministries. I want to make sure that
4 that's well understood.

5 A. Okay.

[illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 Q. Mrs. Hunt, it's not uncommon that when
 11 you make a contribution to a charitable
 12 organization that the charitable organization
 13 publishes some kind of report, maybe in a glossy
 14 magazine to its donors.

15 I certainly have had that experience.
 16 Does -- does Johnny Hunt Ministries do that?

17 A. No, we do not.

18 Q. You do not.

19 Looking back at the tax returns -- and
 20 I'll just take the 2016 one at the top just as one
 21 example --

22 MR. MACGILL: Thank you.

23 BY MR. MCCORMICK:

24 Q. There's a line item I'm curious about,
 25 line eight on the first page where it says

1 contributions and grants. Do you see that?

2 A. Yes, I do.

3 Q. And it shows that in the prior year which
4 I guess would have been 2015, somebody had paid in
5 \$356,892 by way of contributions and grants.

6 A. Yes.

7 Q. And you see 10,000 for 2016.

8 A. Yes.

9 Q. Who made the contributions and grants?

10 A. I have no idea.

11 Q. You don't know. Do you know who made
12 contributions and grants in the following years?

13 A. No, I don't.

14 Q. The program income from speaking
15 engagements however came from what?

16 A. Churches, conventions --

17 Q. Right.

18 A. -- men's conferences.

19 Q. Uh-huh.

20 A. Any place he was speaking outside of his
21 employment.

22 Q. If Johnny Hunt Ministries were to start
23 paying Johnny Hunt from these program revenues, who
24 would make that decision?

25 A. He would, because he would request it.

1 But then we would go before the board.

2 Q. Awe. Is there a compensation committee?

3 A. No, there's not.

4 Q. There's not. So this would be a decision
5 by the board as a whole?

6 A. Yes.

7 Q. And -- and right now, the four people we
8 spoke about earlier, Mr. Kisse, Ms. Hill and Ms.
9 Anspaugh?

10 A. Yes.

11 Q. And Johnny?

12 A. Yes.

13 Q. Yes.

14 Did the board of the -- I'm sorry.

15 Did the board of directors ever conduct
16 any kind of survey to determine what would be
17 reasonable compensation for Mr. Hunt if they -- if
18 they started to choose paying him income?

19 A. No.

20 Q. No.

21 Could they pay him 100 percent of program
22 revenues?

23 A. Could they? I have no idea.

24 Q. Uh-huh.

25 A. I don't -- I don't know why they would.

1 Q. Has the board of directors of Johnny Hunt
2 Ministries ever, you know, put in place any
3 criteria for making the judgment?

4 A. No.

5 Q. No.

6 Would it be fair to say that basically
7 the board of directors of Johnny Hunt Ministries is
8 Johnny Hunt?

9 A. No.

10 Q. No? Okay.

11 Would any of the members of the board of
12 directors of Johnny Hunt Ministries say no, we're
13 not going to do that?

14 A. Probably.

15 Q. Who?

16 A. Any -- any of the ones on the board would
17 have that opportunity.

18 Q. Even though they were picked by you and
19 Mr. Hunt?

20 A. Of course.

21 Q. Uh-huh.

22 So it's Johnny Hunt Ministries' testimony
23 then in this room just to be clear, that it stood
24 ready at a moment's notice if Johnny requested it
25 to pay thousands of dollars of program revenue to

1 him if he personally chose to do so?

2 A. That's not very likely to happen. But
3 they could because --

4 Q. It's not likely --

5 A. -- they're the board of directors.

6 Q. -- to happen?

7 A. It's not likely to happen.

8 Q. Look again at the 990s.

9 A. For which year? Oh, yes. Which year?

10 Q. All of them. I'm sorry. All of them.

11 MR. MACGILL: Well, which -- she's not
12 going to look at all of them at once. Do you want
13 her to look at any one of them in particular?

14 MR. MCCORMICK: Well, okay. I'm going to
15 go one by one starting with 2016.

16 MR. MACGILL: Okay.

17 A. Okay.

18 BY MR. MCCORMICK:

19 Q. Actually, before we do that, I will ask
20 you to take one more look at the expert report
21 which I previously showed you. And, again, I am
22 not going to ask you to agree or disagree with
23 anything in the report. And I assure you again
24 this is not a trick question. Okay?

25 Paragraph 22 on page 6.

1 A. Okay.

[illegible]

■ [REDACTED]

■ [REDACTED] ■ [REDACTED]

3 MR. MACGILL: Wait. Hold on, Counsel.

4 When you say positing --

5 MR. MCCORMICK: I'm trying to --

6 (Simultaneous speaking.)

7 MR. MCCORMICK: Hold on. Wait. I
8 haven't finished my question yet.

9 MR. MACGILL: Well, I have no idea what
10 you're talking about. We're -- she's not here to
11 testify on the expert report, so you'd better be a
12 lot more clear about what you're asking --

13 MR. MCCORMICK: I would -- I would be --
14 I would --

15 MR. MACGILL: -- because we're going to
16 put an end to this right away.

17 MR. MCCORMICK: We're not putting an
18 end --

19 MR. MACGILL: She's not --

20 MR. MCCORMICK: -- to anything.

21 MR. MACGILL: Yeah, we are.

22 MR. MCCORMICK: I haven't even finished
23 my question. You have to wait for me to finish my
24 question before you object, please.

25 MR. MACGILL: You --

1 MR. MCCORMICK: Can we have --

2 MR. MACGILL: -- are misrepresenting --

3 MR. MCCORMICK: -- an ounce of civility
4 here?

5 MR. MACGILL: No, no, no. I want you to
6 have an ounce of reality.

7 She is a witness at here's to testify --
8 is here to testify on behalf of Johnny Hunt
9 Ministries. You put an expert report in front of
10 her and question -- questioning her about an expert
11 report.

12 Now, you know better. Now, you better be
13 real careful because I'm going to terminate this
14 deposition immediately. Ask your question but
15 you're on notice. Ask your question.

16 MR. MCCORMICK: All right. I am going to
17 ask my question.

18 BY MR. MCCORMICK:

19 Q. All right. I do not ask you, Mrs. Hunt,
20 to say that the program revenue would have been
21 \$331,000 per year. I will not put those words into
22 your mouth. I do not expect Johnny Hunt Ministries
23 to say that. My only question is, just for
24 purposes of my question, hear me carefully,
25 assuming that the number were \$331,000 a year --

1 MR. MACGILL: What number, Counsel?

2 MR. MCCORMICK: Total revenue -- program
3 revenue --

4 MR. MACGILL: To Johnny Hunt?

5 MR. MCCORMICK: Well, let me finish the
6 question.

7 MR. MACGILL: No, no. We're not doing
8 this. Are you tell -- you need to define your
9 question. We're not going to play word games here,
10 Counsel. You know better. And I'm sitting here
11 and --

12 MR. MCCORMICK: Sir --

13 MR. MACGILL: -- word games don't get
14 played when I'm in the room.

15 MR. MCCORMICK: Sir --

16 MR. MACGILL: I'm not letting you do it.

17 MR. MCCORMICK: A question -- a question
18 is not a word game.

19 MR. MACGILL: It's a word game --

20 MR. MCCORMICK: And it hasn't even been
21 finished.

22 MR. MACGILL: Let me be very clear, we're
23 not playing games here, sir.

24 MR. MCCORMICK: This is another speaking
25 objection --

1 MR. MACGILL: No. I'm --

2 MR. MCCORMICK: -- you did this the last
3 time.

4 Mr. MACGILL: -- talking about you.

5 You have a responsibility to the Court.

6 You have -- we gave you a deposition of this woman
7 on Johnny Hunt Ministries. Now, if you want to ask
8 questions that have nothing to do with this, you
9 have no basis for that proceeding. Now, I want you
10 to tell us what revenue are you talking about?

11 MR. MCCORMICK: Well, okay. I think if
12 we look at the paragraph that I just quoted, it
13 identifies that revenue. Speaking engagements,
14 selling publications, conducting conferences.

15 MR. MACGILL: Whose revenue is that,
16 Counsel?

17 BY MR. MCCORMICK:

18 Q. Mrs. -- Mrs. Hunt, let me ask you this
19 question. Let me back up and lay a foundation if
20 it will make it easier for you.

21 Do speaking engagements, selling
22 publications, and conducting conferences represent
23 the program revenue historically received by Johnny
24 Hunt Ministries?

25 MR. MACGILL: Counsel, who's --

1 MR. MCCORMICK: Is that an objectionable
2 question? Can I finish -- can I get an answer to
3 that question?

4 MR. MACGILL: No, you may not.

5 You're talking about Johnny Hunt revenue
6 and you're attempting to confuse this witness
7 through your question. It's Johnny Hunt's money --

8 SPEAKER: (Indiscernible).

9 MR. MACGILL: -- and you know better.

10 MR. MCCORMICK: Sir, I'm talking about --

11 MR. MACGILL: You know better,
12 Counselor --

13 MR. MCCORMICK: I do not know better.
14 I'm asking the question. Johnny Hunt Ministries --
15 BY MR. MCCORMICK:

16 Q. Mrs. Hunt, earlier I think we had some
17 testimony where you said that speaking revenue was
18 historically booked through Johnny Hunt Ministries;
19 is that correct?

20 A. Yes.

21 Q. You so testified. Would the same be true
22 of selling book publications?

23 A. Yes.

24 Q. Yes. Conducting conferences?

25 A. Yes.

1 Q. Does that represent basically the program
2 revenue of Johnny Hunt Ministries?

3 A. Not totally.

4 Q. What else?

5 A. Donations to the ministry.

6 Q. Okay. Let's put donations to the side
7 for a moment just to make it crystal clear. Okay.
8 The way that Johnny Hunt Ministries does business
9 is Johnny does the sermons, Johnny writes the
10 books, the money comes in to Johnny Hunt
11 Ministries; correct?

12 MR. MACGILL: Counsel, you know better
13 and you're intentionally misrepresenting the
14 details here.

15 MR. MCCORMICK: Well --

16 MR. MACGILL: We'll -- we'll --

17 MR. MCCORMICK: The witness can answer --

18 MR. MACGILL: -- deal with you later.

19 MR. MCCORMICK: -- my question.

20 MR. MACGILL: We'll deal with you later.

21 Go ahead and answer his questions. We'll come
22 back. We'll deal with you later.

23 MR. MCCORMICK: Deal with me all you
24 like.

25 BY MR. MCCORMICK:

1 Q. Assume \$331,000 in program revenue in a
2 year. Just assume that. Okay? Johnny Hunt
3 Ministries reports the program revenue on the tax
4 returns every year anyway, yes?

5 A. Yes.

6 Q. So let's just say 331,000 just -- just
7 for purposes of laying up my question. You with me
8 so far?

9 Looking at tax return 2016, again, page
10 1. Line 19. Revenue less expenses. You see
11 that?

12 A. What line?

13 Q. Line 19.

14 A. Yes.

15 Q. What was the figure for 2016?

16 A. Four -- \$49,357.

17 Q. Yeah. Basic math. That's -- that's much
18 less than \$331,000, yes?

19 A. Yes.

20 Q. Is it likely that Johnny Hunt Ministries
21 would have paid out \$331,000 to Johnny Hunt in
22 2016?

23 A. I don't understand what you're asking.

24 Q. Would Johnny Hunt Ministries have paid
25 \$331,000 to Johnny Hunt if at the end of the day

1 without having done so it only realized 49,357?

2 A. I don't understand what you're getting
3 at.

4 Q. Well --

5 A. They don't pay him anything.

6 Q. If -- if -- if they had, if they had.

7 A. They didn't.

8 Q. I know they didn't. I'm asking you a
9 question.

10 If they had, based on this tax return,
11 Johnny Hunt Ministries would have recognized a
12 loss; is that not correct?

13 A. Well, if they had, I guess it would have
14 been a loss, but they didn't.

15 Q. Right.

16 Is it likely that they would have done so
17 if -- if in the process, they would have lost over
18 \$200,000?

19 MR. MACGILL: Counsel -- Counsel, I mean,
20 this is absurd. I mean, you --

21 MR. MCCORMICK: This is --

22 THE WITNESS: I don't even know what
23 that --

24 (Simultaneous speaking.)

25 MR. MACGILL: Let me -- let me make my

1 point. No one can follow your logic, including the
2 witness. You're misrepresenting the --

3 MR. MCCORMICK: Oh, I think the
4 witness can follow my logic --

5 MR. MACGILL: Your -- your co-counsel is
6 raising his hand and laughing. Okay?

7 MR. KLEIN: No. I'm saying I understand
8 it.

9 MR. MACGILL: No. You're --
10 (Simultaneous speaking.)

11 MR. MACGILL: -- you're laughing.

12 MR. KLEIN: I understand it.

13 MR. MACGILL: Counsel, this is not funny.

14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 MR. MCCORMICK: I did -- I did read
22 that --

23 MR. MACGILL: You did not read that --

24 MR. MCCORMICK: -- word for word.

25 MR. MACGILL: -- Counsel. Did not.

1 Now --

2 MR. MCCORMICK: If I -- if I misread or
3 dropped a word, I do apologize, Mrs. Hunt.

4 MR. MACGILL: You did.

5 BY MR. MCCORMICK:

6 Q. Mrs. -- Mrs. Hunt, in a year, when you
7 had less than \$331,000 of revenue -- you're on the
8 board; right?

9 A. No.

10 Q. No. You're not. I'm sorry.
11 You were on the board at some point?

12 A. At some point.

13 Q. Right. Okay.

14 During a year when Johnny Hunt Ministries
15 collected less than \$331,000 worth of income, would
16 it have paid \$331,000 of money directly to Johnny
17 Hunt?

18 MR. MACGILL: Object to the form. It is
19 nonsensical, your question.

20 MR. MCCORMICK: You can answer my
21 question.

22 THE WITNESS: Repeat the question.

23 MR. MCCORMICK: Do please repeat the
24 question.

25 (The Court Reporter read back the

1 requested portion.)

2 A. It could have. But it didn't.

3 BY MR. MCCORMICK:

4 Q. What would -- what would the result have
5 been if it had? Where would that money have come
6 from?

7 A. I don't understand your line of
8 questioning and I don't know how to answer that
9 because I don't know what you're getting at.

10 Q. Well, would it have --

11 A. It sounds like a trick question.

12 Q. It's not a trick question. If it's -- if
13 it's not income, right, does the money have to come
14 out of assets?

15 MR. MACGILL: Counsel, same thing. This
16 is nonsensical. There's -- there's no ability of
17 counsel --

18 A. I'm not even going to answer that.

19 MR. MACGILL: -- or the witness to
20 understand what you're saying or doing.

21 MR. MCCORMICK: I'm sorry. Mrs. Hunt,
22 are you --

23 A. I don't know what you're getting at.

24 MR. MCCORMICK: -- refusing to answer the
25 question?

1 MR. MACGILL: She's not refusing. Answer
2 what you can.

3 MR. MCCORMICK: I think the -- I think
4 the witness just said I'm not answering that.

5 A. I don't know how to answer that.

6 COURT REPORTER: Please speak one at a
7 time.

8 BY MR. MCCORMICK:

9 Q. Is it likely for Johnny Hunt Ministries
10 to pay money that it doesn't have?

11 A. Of course not.

12 Q. Thank you.

13 Does Johnny Hunt Ministries have a view
14 as to how people paying for conferences or sermons
15 would feel if they knew that Johnny Hunt Ministries
16 was paying Johnny Hunt's attorneys' fees for this
17 litigation?

18 A. Repeat the question.

19 MR. MACGILL: Object to -- object to the
20 question. No foundation.

21 BY MR. MCCORMICK:

22 Q. Well, if somebody who had paid money to
23 go to a Johnny Hunt conference were to call up the
24 Johnny Hunt Ministries and say, you're using my
25 money to pay Johnny Hunt's attorneys, what would

1 you tell them?

2 A. We pay -- we are paying expenses.

3 Q. Uh-huh.

4 A. For the litigation.

5 Q. Do the people who pay to go to see Johnny
6 Hunt's sermons or to go to his conferences expect
7 that that's going to happen?

8 A. Well, I can't answer that question for
9 what they would expect. And everything is public.
10 We have -- it shows in our records where the money
11 goes and it would show it would be for legal
12 expenses.

13 Q. Did the board approve that --

14 A. Is public. Yes.

15 Q. It did. How did that happen?

16 A. On the recommendation of our tax
17 attorney.

18 Q. Well, I don't want to -- I don't want to
19 go into attorney-client privileged communications.
20 When did that happen?

21 A. At our board meeting last year.

22 Q. Was there a resolution?

23 A. There was a discussion.

24 Q. Was there a vote?

25 A. Yes.

1 Q. Yeah. All right. Mrs. Hunt, let's
2 switch gears for a second.

3 And you're aware that the foundation of
4 this litigation right now is based upon an
5 encounter that took place between Mr. Hunt and a
6 person whom I will refer to as Jane Doe?

7 A. Uh-huh.

8 Q. You and I both know who Jane Doe is?

9 A. Absolutely.

10 Q. I don't need to go into that.

11 Do you have -- does Johnny Hunt
12 Ministries have any awareness of having paid any
13 funds to Jane Doe or her husband --

14 A. No.

15 Q. -- in 2010?

16 A. No.

17 Q. For reimbursement for the rental of a
18 condo?

19 A. Not that I remember.

20 Q. Okay.

21 MR. MCCORMICK: What was that last item I
22 had marked?

23 MR. KLEIN: Last one is 11, I believe. I
24 think this one is 12.

25 MR. MCCORMICK: Numbers here are

1 different. Let's --

2 COURT REPORTER: Right there

3 (indicating).

4 MR. MCCORMICK: That's why they're

5 different.

6 BY MR. MCCORMICK:

7 Q. Mrs. Hunt, yesterday we heard some

8 testimony from Mr. Hunt --

9 (Overhead lights turn off.)

10 MR. MCCORMICK: There we go again.

11 SPEAKER: You got it, Johnny?

12 MR. KLEIN: Thank you, Mr. Hunt.

13 (Discussion held off the record.)

14 MR. HUNT: Walk into the light.

15 MR. KLEIN: Yeah. I can give you a

16 little pointer how to do it --

17 MR. HUNT: Place needs light.

18 BY MR. MCCORMICK:

19 Q. That his speaking engagements have dried

20 up in the year 2022. Do -- do you have knowledge

21 of that?

22 A. Yes.

23 How much of his speaking -- engagements

24 for the year 2022 have dried up.

25 A. I couldn't say how much.

1 Q. Did --

2 A. A lot.

3 Q. A lot. Was he still out on the road
4 giving sermons here and there during the year 2022?

5 A. Yes. Some.

6 MR. MACGILL: So now we're in her
7 personal deposition?

8 MR. MCCORMICK: No, I'm actually asking
9 Johnny Hunt Ministries because we've --

10 MR. MACGILL: Okay. So --

11 MR. MCCORMICK: -- we've had -- we've had
12 testimony --

13 MR. MACGILL: -- ask it now and then you
14 don't need to ask it during her personal
15 deposition but this is her personal --

16 MR. BESEN: Well, that's -- no. That's
17 not how it works.

18 MR. MACGILL: It is how it's going to
19 work.

20 MR. BESEN: No, it's not, actually.
21 You're wrong and you're not in control.

22 MR. MACGILL: I'm in charge, you're
23 not --

24 MR. MCCORMICK: No. I -- I am in charge.
25 Okay?

1 MR. MACGILL: We're in charge of --

2 (Simultaneous speaking.)

3 MR. MCCORMICK: To quote Al Haig.

4 COURT REPORTER: Excuse me. One at a
5 time.

6 MR. MACGILL: Let me just make -- explain
7 something, Gene. We're in charge of what the
8 witness will do and not do with the questions that
9 she's going to answer. You take your positions.
10 We're going to take ours. But she's not going to
11 be abused here.

12 MR. BESEN: No one's abusing --

13 MR. MACGILL: Not going to happen.

14 MS. BESEN: Asking her a question about
15 Johnny Hunt Ministries. She's here as a corporate
16 rep.

17 MR. MCCORMICK: Counsel --

18 MR. MACGILL: Ask your --

19 MR. MCCORMICK: Counsel --

20 MR. BESEN: You're --

21 MR. MCCORMICK: Counselor, I want to put
22 this on the record.

23 You know, I've been pulling my punches
24 here. No. 1, you are not in charge here. This is
25 my deposition and this is my deposition room.

1 Second, the Court is in charge here
2 ultimately. Not you.

3 Now, you can object on the grounds of
4 privilege and tell the client not to answer. You
5 can --

6 MR. MACGILL: That's what I'm telling
7 you.

8 MR. MCCORMICK: -- you can give me --

9 MR. MACGILL: You need to understand that
10 now --

11 MR. MCCORMICK: No, no, no. I think --

12 MR. MACGILL: I'm telling you --

13 MR. MCCORMICK: -- you're the one who
14 needs to understand how depositions work.

15 COURT REPORTER: One at a time, please.

16 MR. MACGILL: What I'm telling you is the
17 way it's going to be. And I'm telling Gene Besen
18 the same thing. Here's the way it's going to be.

19 MR. MCCORMICK: Think again.

20 MR. MACGILL: No, no. Here's the way
21 it's going to be.

22 We are going to tell this witness --
23 we're offering this witness as Johnny Hunt
24 Ministries as agreed, No. 1. No. 2, she's going to
25 testify individually. You can't do both at the

1 same time.

2 MR. MCCORMICK: I have no object of doing
3 that. If you would please allow me to finish my
4 question, sir.

5 BY MR. MCCORMICK:

6 Q. Mrs. Hunt, I think we've established
7 twice already with you that most of the speaking
8 engagements are run through Johnny Hunt Ministries;
9 correct?

10 A. Yes.

11 Q. And I am asking you as Johnny Hunt
12 Ministries here, the speaking engagements were run
13 through it, they were recorded financially through
14 Johnny Hunt Ministries?

15 A. Yes.

16 Q. And as we have seen, they are reported on
17 the tax returns; correct?

18 A. Yes.

19 Q. Okay. I am asking Johnny Hunt Ministries
20 only right now, in 2022, there were some
21 speaking engage -- oy vey -- there were some
22 speaking engagements that did go forward.

23 A. Some but not many.

24 Q. Not many. Did it pick up in 2023?

25 A. I would have to look back at the records

1 but perhaps, maybe.

2 Q. Perhaps. Okay. People are still willing
3 to ask Johnny Hunt to come and give them sermons
4 throughout the country?

5 A. Some.

6 Q. He did some traveling?

7 A. A little, yes.

8 Q. A little?

9 A. Uh-huh.

10 Q. How many Sundays has he been here and
11 there across the United States giving sermons this
12 year? I'm -- now I'm in 2024 of course.

13 A. He -- he -- he stays pretty busy, but
14 it's not --

15 Q. Stays pretty busy?

16 A. -- any places like he used to go.

17 Q. Okay.

18 A. It's changed. The dynamics of the places
19 that he goes has entirely changed from the places
20 that he was going before 2022.

21 Q. Okay. I understand.

22 2019 was a gangbusters year. We can
23 agree; right?

24 A. I don't have 2019 --

25 Q. Okay. Well, if you take a look at the

1 tax returns for 2019. This is actually a softball
2 question.

3 MR. MACGILL: You want to hand me those
4 two?

5 MR. KLEIN: You got that?

6 BY MR. MCCORMICK:

7 Q. So just -- just to pick an example, line
8 nine on page 1.

9 A. Okay.

10 Q. 454,000 and change.

11 A. Yes, sir.

12 Q. It was -- that was a great year.

13 A. Yes, sir.

14 Q. Okay. You're saying it's not -- it's not
15 there right now?

16 A. Definitely not.

17 Q. Okay. I'm going to show you what has
18 been marked for identification as JHM 12.

19 (Defendants' Exhibit No. 12 was marked.)

20 BY MR. MCCORMICK:

21 Q. Did I -- yes.

22 A. Okay.

23 Q. All right. Who's Kerry?

24 A. Johnny's assistant.

25 Q. For Johnny Hunt Ministries?

1 A. Yes.

2 Q. So this is a Johnny Hunt Ministries
3 document?

4 A. Well, yes.

5 Q. Okay. And you'll see behind the email a
6 chart.

7 A. Okay.

8 Q. I don't know whether you personally have
9 seen that chart --

10 A. No, I have not.

11 Q. -- or any iteration.

12 A. No.

13 Q. But do -- do you recognize the -- the
14 schedule that it represents?

15 A. Yes.

16 Q. All right. And -- and what does it
17 reflect?

18 A. It looks like the places that he is
19 supposed to be. It looks like his calendar.

20 Q. Do you have any familiarity with whether
21 those events went -- went forward?

22 A. No.

23 Q. Okay. And -- and by your answer, do you
24 mean, no, you don't have any familiarity or you
25 don't know whether they went forward?

1 A. Is that -- that both the same thing?

2 Q. Well, I did two. If the answer is you
3 don't know, you don't know?

4 A. I don't know.

5 Q. You're not -- you're not in a position on
6 behalf of Johnny Hunt Ministries to tell me how
7 many were canceled and how many were not?

8 A. No, I don't know.

9 Q. You didn't explore that before --

10 A. No.

11 Q. -- preparing for this deposition?

12 A. No, I didn't.

13 Q. All right. So what can you -- what can
14 you tell me then in terms of program revenue from
15 Johnny Hunt Ministries?

16 A. I can tell you that the places he goes
17 now --

18 Q. Uh-huh.

19 A. -- the places he's invited to go --

20 Q. Uh-huh.

21 A. -- are a lot smaller.

22 Q. Uh-huh.

23 A. And I don't want to say insignificant,
24 but there were significant events that he would be
25 invited to go to which he no longer is invited to.

1 The churches are much, much smaller.
2 Meaning the revenue for that -- what that church
3 could pay is a lot smaller than where he was going
4 before 2022.

5 Q. The program revenue nevertheless will be
6 reflected on the 2023 tax return when it is
7 provided to us?

8 A. Yes, it will.

9 Q. And we'll be able to make a computation?

10 A. Oh, yes.

11 Q. All right. And you just came back from a
12 conference overseas, yes?

13 A. Let's see. No. No. He didn't have a
14 conference.

15 Q. It was a speaking engagement?

16 A. No, it was not.

17 Q. What was it?

18 A. It was a educational trip.

19 Q. Uh-huh.

20 A. Study the journeys of Paul.

21 Q. Uh-huh. And what was the last conference
22 he spoke at?

23 A. I'd have to look at my calendar.

24 Q. Was there --

25 A. I can't keep up with where he's at all

1 the time.

2 Q. A Jubilee?

3 A. Yes.

4 Q. Yes.

5 A. Yes. Exactly.

6 Q. So the good ship lollipop is -- is
7 sailing along?

8 A. I don't know what --

9 Q. He's speaking --

10 A. -- that is.

11 Q. He's speaking?

12 A. Some.

13 Q. People are listening to him?

14 A. I hope.

15 Q. There's an audience?

16 A. Should be.

17 Q. To the knowledge of Johnny Hunt
18 Ministries --

19 A. Uh-huh.

20 Q. -- and, again, switching gears. After
21 the 2019 encounter between --

22 MR. KLEIN: You said 2019.

23 MR. MCCORMICK: Did I say 2019?

24 MR. KLEIN: Yeah.

25 MR. MCCORMICK: It's catching up with me.

1 BY MR. MCCORMICK:

2 Q. The 2010 encounter --

3 A. Yes.

4 Q. -- between Mr. Hunt and his accuser --

5 A. Yes.

6 Q. -- were there any communications among
7 the officers or directors of Johnny Hunt Ministries
8 concerning any sexual harassment, sexual assault,
9 intimidation, improper fondling, improper sexual
10 conduct, unwanted touching or kissing, flirtation
11 or any -- any contact of that nature on the part of
12 Mr. Hunt?

13 A. I explained to our board at our last
14 board meeting in '23 the details of this lawsuit.
15 So the board members do know about the accusations
16 because they have read the crazy Guidepost report.
17 And we told them -- Johnny told them what actually
18 happened. So, yes, they do. The board -- the
19 board members know what's happening.

20 Q. When you -- said you reported to the
21 board members the -- the accusations. Are you
22 saying that you reported to the board the
23 accusations as detailed in the Guidepost report?

24 A. Well, they had read the Guidepost report
25 so we didn't have to talk about the allegations in

1 the Guidepost report. They read the report. So
2 they knew what the allegations were.

3 So Johnny gave his side of the story as
4 to what actually did happen in opposition --

5 Q. To Mr. --

6 A. -- to what the Guidepost report said
7 which was totally false.

8 Q. All right. And so he was speaking to
9 Mrs. Anspaugh and Mr. --

10 A. Yes.

11 Q. -- Kisse and --

12 A. Yes.

13 Q. -- the other director?

14 A. Yes, yes.

15 Q. Okay. And you said you made a report to
16 the board too. You spoke as well.

17 A. Well, I was there.

18 Q. You were there.

19 A. I was there.

20 Q. Who was doing the speaking?

21 A. Johnny.

22 Q. What did Johnny say?

23 A. He -- pretty much what he told you
24 yesterday I'm sure. He just -- story has never
25 changed. It's the story of what actually happened.

1 Which I don't want to go into.

2 Q. Well, I'm afraid I hate to bring you here
3 under oath, but you have to go into it to a certain
4 extent. But not to make too fine a point about it,
5 my question wasn't just limited also to the
6 allegations in the report. During that
7 conversation with these other people --

8 A. Uh-huh. Yes.

9 Q. -- you know, did Mr. Hunt say anything
10 about, you know, what had actually happened in his
11 mind as opposed to what was in the report?

12 MR. MACGILL: And you're talking about
13 the -- this meeting at the end of 2023 with the
14 board of directors?

15 MR. MCCORMICK: That's -- that was my
16 question.

17 MR. MACGILL: Let me --

18 A. He told them there was some unbecoming
19 behavior --

20 MR. MACGILL: Well, let me ask you
21 this --

22 A. -- not like --

23 MR. MACGILL: -- was counsel -- was
24 counsel present during that meeting?

25 THE WITNESS: No. Counsel was not.

1 MR. MACGILL: Okay. All right.

2 BY MR. MCCORMICK:

3 Q. And this is one of the topics that we
4 noticed -- you know, identified in the -- in the
5 subpoena so I was expecting that Mrs. Hunt would
6 come prepared on behalf of the organization to
7 testify what was discussed among the constituents
8 within the corporation.

9 A. Yes. He told them there was some
10 unbecoming behavior but not what was reported in
11 the Guidepost report.

12 Q. All right. What -- what did the
13 directors say?

14 A. I don't recall what they said.

15 Q. Did they ask any questions?

16 A. I don't remember if they asked questions
17 or not.

18 Q. Did the directors ask whether any conduct
19 of this sort had happened with regard to any other
20 person?

21 A. No.

22 Q. It didn't come up?

23 A. No.

24 Q. All right. Did the directors ask for any
25 kind of verification of any statement that Mr. Hunt

1 had made --

2 A. No.

3 Q. -- before them?

4 Did the board of directors consider
5 whether it was appropriate for him to step down
6 from the board?

7 A. No. That was never discussed.

8 Q. Was never suggested?

9 A. Never.

10 Q. No.

11 Did they express any disappointment in
12 his conduct?

13 A. Never.

14 MR. MCCORMICK: Five-minute break?

15 MR. MACGILL: No problem.

16 VIDEOGRAPHER: We are now going off the
17 video record. The time is currently 10:17 a.m.

18 (Off the record; recess.)

19 VIDEOGRAPHER: We are now back on the
20 video record. The time is currently 10:36 a.m.

21 MR. MCCORMICK: Mrs. Hunt, thank you. I
22 have nothing further at this time.

23 MR. MACGILL: So, Gene, have you got
24 anything?

25 MS. CALLAS: Yeah, I do.

1 MR. MACGILL: Oh, Gretchen?

2 MS. CALLAS: Yeah. Hi, Mrs. Hunt --

3 MS. KLEIN: Oh, wait.

4 THE WITNESS: Hello.

5 MR. KLEIN: You need a microphone? Oh,
6 he's ready.

7 MS. CALLAS: Good? Okay.

8 CROSS-EXAMINATION

9 BY MS. CALLAS:

10 Q. Good morning, Mrs. Hunt.

11 A. Good morning.

12 Q. My name is Gretchen Callas. I am counsel
13 for the Executive Committee of the Southern Baptist
14 Convention. I have a few questions for you in your
15 capacity as the corporate representative of Johnny
16 Hunt Ministries.

17 So one of the questions I have: We heard
18 some testimony yesterday from your husband that he
19 has attorneys' fees that may have been paid for or
20 reimbursed by Johnny Hunt Ministries.

21 Do you have any information about that?

22 A. As far as I can recollect, we've not
23 actually paid any attorney fees, but we've paid for
24 some deposition expenses.

25 Q. Okay. There is --

1 A. Which I think must be two different
2 things maybe.

3 Q. I wanted your understanding. So that's
4 helpful.

5 There are a few exhibits I'd like to talk
6 to you about. The first one is from 2019. It
7 looks like it's been marked Exhibit No. 8. Can you
8 locate that exhibit?

9 MR. MACGILL: Yep.

10 MS. CALLAS: Thank you.

11 BY MS. CALLAS:

12 Q. So I'm going to direct you to a
13 particular page in this document. It is Bates
14 marked at the bottom JHM 400. So if you'll turn
15 about halfway through.

16 A. Okay.

17 Q. Do you see, this has a pie chart at the
18 top and it's 2019 Johnny Hunt Ministries Income and
19 Spending Report. Do you see that document?

20 A. Yes, ma'am.

21 Q. Could you tell me about the preparation
22 of this document? Do you know how this -- this
23 particular page is prepared?

24 A. Yes. I use an application called
25 Banktivity and in that application, I enter all of

1 the income and expenses and then it produces the
2 report.

3 Q. And it appears -- and we'll look at a few
4 others -- that you have used this application for
5 other years.

6 A. Yes, I have.

7 Q. Do you know the first year you used this?

8 A. No, I don't.

9 Q. So if we look at 2019, it does have
10 income summary and a total. Do you see that
11 number?

12 A. Yes.

13 Q. 900 and --

14 A. Yes.

15 Q. -- 59,000 dollars; is that right?

16 A. Yes.

17 Q. The very first line item is speaking. Do
18 you see that?

19 A. Yes.

20 Q. Now, would you have made determinations
21 on your own as to what income would relate to a
22 speaking engagement as opposed to sales or
23 sponsorships?

24 A. Yes. It's broken down into different
25 categories.

1 Q. And my -- and my question really went to
2 who -- who decides whether income is for speaking
3 or for a sponsorship?

4 A. I do, according to the information that I
5 receive about the amount of money.

6 Q. Okay. And how do you get that
7 information? Does that come to you from an
8 accountant or --

9 A. The deposits made into the checkbook.

10 Q. So are you looking at checks to determine
11 who's written a check?

12 A. Yes.

13 Q. And then you will -- you decide that this
14 check and the entity who wrote the check to Johnny
15 Hunt Ministries was writing that check because
16 there was a speaking engagement; is that correct?

17 A. Yes.

18 Q. There are a few I'll call them more
19 specific items. For example, Israel commissions.
20 Do you see that?

21 A. Yes. Well, no, I don't see it, but let's
22 see. Where is it at?

23 Q. It's about halfway down that list --

24 A. Oh, yes. I see it.

25 Q. -- on page 400.

1 A. Yes.

2 Q. Explain just for purposes of the record,
3 what was that event or what was that income?

4 A. Okay. We -- we are in partnership I
5 guess you might say -- not partnership. That's not
6 a good word. We -- we take Israel tours and he
7 receives a bit of commission on each person who is
8 a participant. And then if he takes some --
9 another pastor friend who takes people, he gets a
10 bit of a small commission from the company,
11 Discovery Ministries, for those people.

12 Q. You -- you mentioned an educational trip
13 to I think was it Greece?

14 A. Yes.

15 Q. Would that be a trip where you might get
16 a commission?

17 A. Well, we -- no. Not from that trip. No.

18 Q. But there are some trips you take where
19 there is some commission for having additional
20 people join?

21 A. Yes.

22 Q. So I -- I count about 12 different income
23 categories on this 2019 document. Would you agree
24 with me, there are about 12 different ones?

25 A. Yes.

1 Q. And so is it fair to say that each year,
2 Johnny Hunt Ministries derives income from a
3 variety of sources, not just one?

4 A. Not as much as used to. I mean, this
5 is -- this was 2019 and everything has changed
6 since 2022 after the report came out.

7 Q. Well, we'll look at a couple others that
8 are more recent. But your response raises the
9 question of 2023. We've talked a little bit about
10 that today; is that right?

11 A. Yes.

12 Q. Have you used your application to create
13 this type of document for 2023?

14 A. It's not complete. All the information
15 has not been put into the computer yet. So I can't
16 produce this until I finish putting all the
17 information in.

18 Q. And is -- is there anything you're still
19 waiting to receive, documents --

20 A. No. No.

21 Q. So --

22 A. It's just me not taking the time to put
23 all the information in.

24 Q. And this is a job that you've done,
25 you've not farmed it out to an accountant?

1 A. I -- no. I'm just the bookkeeper. No.
2 I just do it.

3 Q. So we've looked at 2019. And is it
4 correct that the speaking income in 2019 was
5 \$246,956?

6 A. Yes, ma'am.

7 Q. Okay. Let's -- and there were -- there
8 was income from sales and some donations as well?

9 A. Yes.

10 Q. Let's now look at 2020. And that is
11 Exhibit 9.

12 MR. MACGILL: I'll take that one.

13 BY MS. CALLAS:

14 Q. The Bates number is 229 for that same
15 income and spending report.

16 A. Okay.

17 Q. Just so I'm clear, at the top of this
18 page 229, you will see to the right, it says
19 2020-2021; is that correct?

20 A. Yes.

21 Q. Is that just the application, filling in
22 those two --

23 A. Yes, it is. Yes. That's not something I
24 put.

25 Q. So it's correct that this income and

1 spending report is simply 2020?

2 A. Exactly. Yes.

3 Q. Again, we have an income summary and the
4 total income for 2020 was \$1,040,000. Is that
5 approximately right?

6 A. That's what I see. Yes.

7 Q. You've again listed the income sources.
8 I see one, two, three, four, five, six, seven,
9 eight, nine, ten.

10 Do you see ten income sources in 2020?

11 A. Yes.

12 Q. And if you look down that list, you'll
13 see speaking is listed right in the middle as
14 opposed to the top.

15 A. Yes.

16 Q. Are these organized by the greatest to
17 the least?

18 A. No. I don't know. Let's see. It looks
19 like they are. Not organized by me that way, but
20 it's showing on the sheet.

21 Q. All right. So in 2020, speaking appears
22 in the middle and the total is \$70,000; is that
23 correct?

24 A. Yes, ma'am.

25 Q. All right. Let's look at 2021 which

1 would be Exhibit 10. Do you have that? Oh.

2 A. Yes.

3 Q. Oh, okay. Fast.

4 It's page 187.

5 And this is the summary of income and
6 spending for 2021. Again, we have a total income
7 for Johnny Hunt Ministries at \$886,000,
8 approximately; is that right?

9 A. Yes, ma'am.

10 Q. And, again, speaking appears as the
11 second income item and it's \$179,000; is that
12 right?

13 A. No. No. Mine says -- oh, I'm sorry.
14 Looking at the wrong line. Yes. Exactly.

15 Q. But the number one income source for 2021
16 was sales. Is that what you see as well?

17 A. Yes, ma'am.

18 Q. All right. Let's look at one more. That
19 is exhibit -- think it's 3.

20 MR. KLEIN: 2022?

21 MS. CALLAS: 2022.

22 MR. KLEIN: (Indiscernible).

23 MS. CALLAS: Yeah.

24 BY MS. CALLAS:

25 Q. So this is the most recent summary of

1 income and expenses for Johnny Hunt Ministries that
2 we have today; is that right?

3 A. Yes.

4 Q. And this 2022 statement would have
5 included a period of time after the Guidepost
6 report was issued?

7 A. Yes, ma'am.

8 Q. So this summary shows a total income of
9 \$787,000. Is that approximately correct --

10 MR. MACGILL: What page are you looking
11 at, Counsel?

12 MS. CALLAS: I'm sorry. 289.

13 A. Okay.

14 BY MS. CALLAS:

15 Q. Did -- am I correct about the total
16 income for that year?

17 A. Okay. What did you say it was?

18 Q. 787,836.

19 A. Yes, ma'am.

20 Q. Now, is there any way for us to tell by
21 looking at this when that income came in? Does
22 the -- the graph at the top offer any information?

23 A. No. I don't think so.

24 Q. I mean, I -- I do see at the top of this
25 page, there is a bar graph.

1 A. Oh, yes. The bar graph.

2 Q. Does that -- is that tied, do you know,
3 to income and the date a check would have been
4 written or received?

5 A. It looks like it because there's a big
6 dip here showing after the report came out.

7 Q. Tell -- tell me what -- are you looking
8 at July?

9 A. May. May starts going down. Well, it
10 starts going down January, February, March, April,
11 May it starts declining. And then --

12 Q. Are you looking at the -- the -- the bars
13 or the line?

14 A. I'm looking at the bars. I'm not looking
15 at the line.

16 Q. Do you --

17 A. If I look at the lines, the lines go way
18 down.

19 Q. Do you know which one is income versus
20 expense?

21 A. No, I don't.

22 Q. Is it true that both the bar and the line
23 go up in August of '22?

24 A. I'm sorry. Repeat that question.

25 Q. Is it true that both the line and the bar

1 go up in August of 2022?

2 A. It went up a little. Yes.

3 Q. I mean, if you look at April, I -- I just
4 would comment that the bar appears to be above the
5 zero but the line is below the zero. Do we know
6 what those -- what that means?

7 A. No, I don't.

8 Q. All right. So looking again at the
9 income summary for 2022, we have one, two, three,
10 four, five, six, seven, eight, nine, ten, 11, 12.
11 Would you agree that I counted that correctly,
12 income categories?

13 A. Yes, ma'am.

14 Q. So we had actually more income categories
15 than the year before; is that right?

16 A. Yes, ma'am.

17 Q. Can you explain the loan repayment,
18 what -- what was the 70,000-dollar loan repayment?

19 A. I don't know. I would have to look back
20 at my notes.

21 Q. If you flip the page to 2 -- 290, you
22 will see a line item for attorney fees of 72,000.
23 Do you see that?

24 A. Yes.

25 Q. Now, I -- well, I'll ask: Do you know

1 any of the specifics of that expense?

2 A. Well, I think that I must have not used
3 the correct -- the correct terminology whenever I
4 put that category in.

5 Q. Is it possible that Johnny Hunt
6 Ministries did incur attorneys' fees in 2022 or you
7 don't know?

8 A. I don't think so.

9 MR. MACGILL: Are you referring to this
10 case?

11 MS. CALLAS: I don't know. I'm asking if
12 Johnny Hunt Ministries incurred attorneys' fees --

13 MR. MACGILL: Generally?

14 MS. CALLAS: -- in 2022 was the question.

15 A. I -- I think this should have been
16 expenses for depositions perhaps. Like I say, I
17 really don't know without my information in front
18 of me.

19 BY MS. CALLAS:

20 Q. And -- and the information you would need
21 to know the specific reason there was an attorney
22 fee expense would be --

23 A. Invoices.

24 Q. Okay. Is that something you maintain?

25 A. Yes.

1 Q. And how far back do those go?

2 A. When I first started the ministry. I
3 keep everything, so --

4 Q. So --

5 A. -- 2010, I guess.

6 Q. If we look at the income summary back on
7 page 289, you'll see the speaking income appears
8 again sort of in the middle of this list. Do you
9 see that?

10 A. Yes, ma'am.

11 Q. And is that -- is it \$70,000 or \$112,000?

12 A. It looks like 70.

13 Q. 70. So I misspoke earlier when I asked
14 about the loan repayment. It should have been
15 \$51,000. Do you see that now?

16 A. Yes. I do see that now.

17 Q. Okay. But, again, you're not sure what
18 that --

19 A. No. I --

20 Q. -- loan was?

21 A. -- I don't remember.

22 Q. Just so we're clear, since I -- I bungled
23 that a little bit, in 2022, the speaking income for
24 Johnny Hunt Ministries was \$70,000; is that right?

25 A. That's what this says.

1 Q. And we did look earlier that there was a
2 similar income level for speaking engagements in
3 2020. It was \$73,000. Do you recall that from a
4 few moments ago?

5 A. Yes.

6 MS. CALLAS: I think that's all the
7 questions I have. Thank you, Mrs. Hunt.

8 MR. MACGILL: Give me one moment, if you
9 would.

10 One moment, ma'am. I may have a question
11 here. Let's see.

12 DIRECT EXAMINATION

13 BY MR. MACGILL:

14 Q. Mrs. Hunt, I have a few questions.

15 I think that both lawyers here had asked
16 you about attorneys' fees and -- and Gretchen just
17 asked you about a legal fee line of 7 -- \$72,000.
18 Do you remember that?

19 A. Yes.

20 Q. Now, I want to -- we're going to talk
21 about Guidepost and the SBC and the SBC Executive
22 Committee for a few minutes as far as Johnny Hunt
23 Ministries is concerned. Was -- after the
24 Guidepost report was published by Guidepost,
25 published by the SBC and the SBC Executive

1 Committee, was Johnny Hunt Ministries sued?

2 MS. CALLAS: Object to the form.

3 A. Yes.

4 BY MR. MACGILL:

5 Q. Now, with respect to that lawsuit that
6 was filed against defendants including Johnny Hunt
7 Ministries after this report by Guidepost and its
8 publication by Guidepost, its publication by the
9 SBC and its publication by the SBC Executive
10 Committee, did Johnny Hunt Ministries incur legal
11 fees associated with that lawsuit?

12 MS. CALLAS: Object to form.

13 A. Yes, we did.

14 BY MR. MACGILL:

15 Q. Now, when -- when Ms. Callas asked you
16 about that line, when we talked -- when she asked
17 you about this particular line involving attorneys'
18 fees during the year 2022 of \$72,260, was at least
19 a part of that legal fees associated with that
20 lawsuit against the ministry?

21 A. Yes, it was --

22 MS. CALLAS: Object to form.

23 A. -- and that didn't even come to mind
24 until you said that 'cause I've been so focused on
25 this event that I completely forgot about the --

1 the lawsuit against --

2 BY MR. MACGILL:

3 Q. Okay.

4 A. -- Johnny Hunt Ministries. So, yes, we
5 did have some legal fees in addition to deposition
6 expenses.

7 Q. All right.

8 A. So some of that would be --

9 Q. And --

10 A. -- legal fees to a lawyer --

11 Q. And distinct from those legal fees that
12 were paid in connection with the lawsuit against
13 defendants including Johnny Hunt Ministries, you
14 testified about some deposition expenses that
15 ministries has paid in connection with this
16 particular lawsuit.

17 A. Exactly yes.

18 Q. Expenses?

19 A. Expenses, yes.

20 Q. Not fees?

21 A. No. No. We've not paid fees in --

22 Q. All right.

23 A. -- in relation to this case.

24 Q. Prior to coming here today, had you ever
25 seen the expert report prepared in -- in the Johnny

1 Hunt lawsuit?

2 A. No, sir.

3 MR. MACGILL: No further questions.

4 MR. MCCORMICK: I will say on the record,
5 I'm not going to ask further questions.

6 MR. MACGILL: All right. You want --

7 MR. MCCORMICK: The --

8 MR. MACGILL: -- move to this.

9 MR. MCCORMICK: The witness can breathe
10 easy.

11 I will say, I'm going to put on the
12 record a reservation of the right to call Johnny
13 Hunt Ministries back, if necessary, after the
14 production of the 2023 tax return. Hopefully that
15 shall not be necessary, but as I said earlier, we
16 do want to have the return produced. And with
17 that --

18 MR. MACGILL: We will produce those
19 documents. Once they're completed, we will produce
20 in their entirety the 2023 990 and related
21 documentation to -- all counsel for the defense.

22 MR. MCCORMICK: I appreciate the
23 representation.

24 COURT REPORTER: Mr. MacGill, does your
25 client want to read or waive signature?

1 MR. MACGILL: She wants to sign.

2 COURT REPORTER: And did you want to
3 order a copy of her transcript?

4 MR. MACGILL: Of course.

5 COURT REPORTER: And, Ms. Callas, did you
6 want to order a copy of the transcript?

7 MS. CALLAS: Yes, please.

8 MR. MCCORMICK: And it goes without
9 saying, so does Guidepost.

10 VIDEOGRAPHER: Ready to go off? We are
11 now going off --

12 MR. MACGILL: And can I -- one other
13 item. And I apologize.

14 I'm going to supplement our damage claim.

15 We had -- we had not included the legal
16 fees associated with the lawsuit that came as a
17 result of the Guidepost publication, the SBC
18 publication, and the Executive Committee. I will
19 supplement to include the legal fees that have been
20 incurred in connection with that separate lawsuit
21 premised on the Guidepost report. So I will update
22 and get you something promptly.

23 We have another update too that we --
24 based on this testimony we may give you. We'll do
25 that promptly so you have it and we can get you

1 additional information. I believe, Gretchen, that
2 you had asked about it in any event so we will
3 supplement in connection with your questioning.

4 MS. CALLAS: Okay.

5 VIDEOGRAPHER: Okay. All right. We are
6 now going off the video record. The time is
7 currently 11 a.m.

8 (Proceedings concluded at 11:45 a.m.)

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E R R A T A P A G E

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Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or Georgia Code Annotated 9-11-30(e), any changes in form or substance which you desire to make to your deposition testimony shall be entered upon the deposition with a statement of the reasons given for making them. To assist you in making any such corrections, please use the form below. If supplemental or additional pages are necessary, please furnish same and attach them to this errata sheet.

I, the undersigned, 30(b)(6) JOHNNY HUNT MINISTRIES Representative, JANET HUNT, do hereby certify that I have read the foregoing deposition and that, to the best of my knowledge, said deposition is true and accurate (with the exceptions of the following corrections below).

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30 (b) (6) JOHNNY HUNT MINISTRIES

22

Representative, JANET HUNT

Sworn to and subscribed before me

23

_____,
 Notary Public, this _____ day of

24

_____, 202_.

My commission expires: _____

25

DISCLOSURE

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosures:

I am a Georgia Certified Court Reporter. I am here as a representative of Regency-Brentano, Inc. I am not disqualified for a relationship of interest under the provisions of OCGA 9-11-28(c). Regency-Brentano, Inc. was contacted by the offices of Magna Legal Services to provide court reporting services for this deposition. Regency-Brentano, Inc. will not be taking this deposition under any contract that is prohibited by OCGA 15-14-37 (a) and (b). Regency-Brentano, Inc. has no exclusive contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition. Regency-Brentano, Inc. will charge its usual and customary rates to all parties in the case and a financial discount will not be given to any party to this litigation.

This the 19th day of April, 2024.

THERESA B. KRAMER, GA CCR B-1601

C E R T I F I C A T E

I hereby certify that the foregoing transcript was taken down as stated in the caption, that the witness was first duly sworn, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 89 represent a true, correct, and complete transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

The witness did reserve the right to read and sign the transcript.

This, the 26th day of April, 2024.

Theresa B. Kramer

THERESA B. KRAMER, GA CCR B-1601



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